

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 4:14-CR-246 AGF (NAB)
	)	
THOMAS GREGORY ANDERSON, JR.,	)	
et al.,	)	
	)	
Defendants.	)	

**MOTION TO UNSEAL CO-DEFENDANT THOMAS GREGORY ANDERSON, JR.’S  
SEALED MOTION, SEALED REPLY  
AND THE GOVERNMENT’S SEALED RESPONSE  
AS TO DEFENDANT BRIAN CHRISTOPHER HOUNSOM ONLY**

COMES NOW Defendant Brian Christopher Hounsom (“Defendant Hounsom”), by and through his attorney, James W. Schottel, Jr., and respectfully moves this Honorable Court to unseal Co-Defendant Thomas Gregory Anderson, Jr.’s Sealed Motion (Doc. #321), Sealed Reply (Doc. #344) and the Government’s Sealed Response (Doc. #328) as to Defendant Brian Christopher Hounsom Only. As grounds for this Motion, Mr. Hounsom, through counsel, states as follows:

1. On April 15, 2015, Defendant Thomas Gregory Anderson, Jr. (hereinafter “Defendant Anderson”) filed a Sealed Motion (Doc. #321) (hereinafter “the Sealed Motion”) in this above-captioned case.
2. On April 28, 2015, the Government filed a Sealed Response (Doc. #328) to Defendant Anderson’s Sealed Motion.
3. On May 15, 2015, Defendant Anderson filed a Sealed Reply (Doc. #344) in support of his Sealed Motion.

4. On information and belief, Defendant Anderson's Sealed Motion is set to be heard before the Honorable Judge Nannette A. Baker on Tuesday, May 26, 2015 at 9:00 a.m.

5. Defendant Hounsom has been served a subpoena to appear and testify regarding Defendant Anderson's Sealed Motion.

6. Based upon the undersigned's investigation, including telephone conversations with Defendant Anderson's counsel, the Sealed Motion (and subsequent responsive and reply filings) involves factual allegations of Defendant Hounsom's previous conduct.

7. On information and belief, the factual allegations and/or potential testimony of Defendant Hounsom could possibly expose Mr. Hounsom to additional and further criminal prosecution.

8. Based upon the foregoing, Mr. Hounsom should be granted leave for the seal to be lifted in order for his undersigned counsel to obtain copies of the Sealed Motion (Doc. #321), Sealed Response (Doc. #328) and Sealed Reply (Doc. #344) from this Court in advance of the scheduled hearing set for Tuesday, May 26, 2015 at 9:00 a.m.

9. Without having the aforementioned documents, with any attachments, Defendant Hounsom will be subjected to unfair surprise.

10. Additionally, without having the aforementioned documents, the undersigned cannot adequately prepare for the hearing set for May 26, 2015 and will not be in a position to properly advise his client with respect to the subpoena that has been served.

WHEREFORE, based on the foregoing facts and the reasons, Defendant Brian Christopher Hounsom respectfully requests this Honorable Court to grant his Motion to Unseal Co-Defendant Thomas Gregory Anderson, Jr.'s Sealed Motion, Sealed Reply and the

Government's Sealed Response and for such other and further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

SCHOTTEL & ASSOCIATES, P.C.

BY: s/James W. Schottel, Jr.

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Attorney for Defendant  
Brian Christopher Hounsom

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2015, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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United States of America

s/James W. Schottel, Jr.